

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

**DKYLE JAMAL BRIDGES
KRISTIAN JONES
ANTHONY JONES**

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CRIM. NO. 18-193-1

**GOVERNMENT’S RESPONSE IN OPPOSITION TO DEFENDANT DKYLE JAMAL
BRIDGES’ MOTION IN LIMINE TO EXCLUDE EVIDENCE OF TRAFFICKING OF
ADDITIONAL VICTIMS AND EXCLUDE PREJUDICIAL
INFORMATION AND IMAGES**

Defendant Dkyle Jamal Bridges’ recently filed Motion in Limine to Exclude Evidence of Trafficking of Additional Victims (ECF No. 142) is a nearly verbatim recitation of his prior response (ECF No. 73) to the Government’s Motion in Limine to Admit Evidence of Trafficking of Additional Victims (ECF No. 58). In the interest of efficiency, the Government does not duplicate that argument here, but rather notes its opposition to the Defendant’s motion and respectfully incorporates by reference herein its prior filing. *See* ECF No. 58 at 7-10; *see also*, *e.g.*, *United States v. Carson*, 870 F.3d 584, 598-601 (7th Cir. 2017) (affirming admission of evidence regarding other women whom the defendant pimped but who were not named victims in the charged sex trafficking counts). As to the evidence regarding his 2013 assault of a prostitution customer in front of charged victim Z.W. immediately after Z.W. performed a commercial sex date, and evidence from charged victim B.T.’s cell phone of Bridges’ brandishing a firearm in a motel room—raised for the first time in his recent filing—the evidence is intrinsic, direct evidence of the charged offenses, not contrary to Rule 404(b), and of highly probative value that is not

substantially outweighed by the entirely fair prejudice to Bridges. For these reasons and any others adduced at any hearing, Bridges' motion should be denied.

CONCLUSION

For the foregoing reasons, the Court should deny the defendant's motion and find such evidence admissible.

Respectfully submitted,

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United States Attorney

s/ Jessica Urban
SETH M. SCHLESSINGER
Assistant United States Attorney
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Trial Attorney
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U.S. Department of Justice

Dated: February 13, 2019

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2019, I filed this document electronically using the CM/ECF system and thereby caused a copy of the same to be served on all counsel of record.

s/ Jessica Urban
JESSICA URBAN
Trial Attorney
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